



LEGISLATIVE BLACK CAUCUS OF MARYLAND, INC.

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August 4, 2015

Chairman Tom Wheeler

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Re: Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42, Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197, Connect America Fund, WC Docket No. 10-90

Dear Chairman Wheeler,

Lifeline has played a huge role in serving lower-income communities throughout Maryland, a large percentage of them African-American. From 2008 to 2012, during the worst of the most recent economic recession, Lifeline had a 90-fold increase in qualified Maryland residents. The program ensures that all Americans have access to vital communications services, which has played an invaluable role in connecting our Maryland constituents to employers, family, healthcare and help in emergency cases. We commend the work that the Federal Communications Commission has done to maintain and implement this program since it began three decades ago.

We believe it is necessary to support the FCC's proposal to modernize Lifeline and make it more effective for the 21st Century. Technology is improving rapidly, and Maryland prides itself on being at the forefront of innovation. But such innovations should extend to every population. It is extremely important for underprivileged households to have access to telecommunications services that are offered to all citizens, allowing them to be competitive in the job market and work on advancing their education. Broadband is one such service we hope to expand within the Lifeline network. However, this service should not come at the expense of traditional phone services. Not to mention, the monthly allotment that is currently being used for voice services would not be sufficient to support broadband services, nor a bundle of both voice and broadband. The level of broadband qualified consumers would receive will not have a substantial impact on Lifeline adoption by low-income households. It will not be able to rightly solve any communications issues. Furthermore, customers who are utilizing Lifeline cannot afford to make any payments to get the additional service. As a result, free wireless Lifeline will be adversely

affected. Historically, low participation rates were the direct cause and effect of such payment system.

There has been a proposal to also offer Lifeline benefits directly to customers through a voucher system. Such a system will also impede the ability for Eligible Telecommunications Carriers (ETCs) to reach qualified low-income individuals and households. Consumers who are eligible for Lifeline must have full access to the program. This proposal can also be subject to abuse by those who will see it as an opportunity to take advantage of others' needs. Bad actors would use the voucher for an unintended purpose. Lifeline provides vital telecommunication services and it is crucial that we set adequate rules to manage the program.

The final issue that concerns us is the plan to have the eligibility determinations made by either a government entity separate from the FCC or a third-party private entity under contract with the government. ETS's should use personal identification requirements to prevent fraud and serve the same regulatory purpose, without adding an unnecessary burden on the carrier and possible delays in service for consumers. As an example, we have a secure form to check eligibility for Lifeline in Maryland, so there is no need to change our enrollment processes and add obstacles for the neediest residents of the state.

We thank you for your time and consideration and we look forward to the modernization of the Lifeline program. It is a program that many of our constituents need to gain access to vital communications and emergency services, allowing them the ability to thrive within their communities.

Sincerely,



Delegate Barbara A. Robinson
Chair, Legislative Black Caucus of Maryland, Inc.

cc: Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly